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6	Counsel for Trans Union LLC				
7	**Designated Attorney for Personal Service**				
8	Kurt Bonds, Esq.				
9	Nevada Bar No.: 6228 6605 Grand Montecito Parkway, Suite 200				
10	Las Vegas, Nevada 89149				
11	IN THE UNITED STATES DISTRICT COURT				
	FOR THE DISTRICT OF NEVADA				
12	FOR THE DISTRICT OF NEVADA				
13	CHRIS V. JEFFERSON,	Case No. 2:21-cv-01636-JAD-DJA			
14	Plaintiff,	JOINT MOTION AND ORDER			
15	v.	EXTENDING DEFENDANT TRANS UNION LLC'S TIME TO FILE AN			
16	NATIONAL CREDIT SYSTEMS, INC.,	ANSWER OR OTHERWISE RESPOND			
17	EQUIFAX INFORMATION SERVICES, LLC,				
18	and TRANS UNION LLC,	(FIRST REQUEST)			
	Defendants.				
19	Dlaintiff Chris V Jaffarson ("Dlaintiff") an	d Defendant Trans Union LLC ("Trans Union")			
20	Plaintiff Chris V. Jefferson ("Plaintiff") and Defendant Trans Union LLC ("Trans Union")				
21	by and through their respective counsel, file this Joint Motion Extending Defendant Trans Union's				
22	Time to File an Answer or Otherwise Respond to Plaintiff's Complaint.				
23	1. On September 3, 2021, Plaintiff filed his Complaint. Trans Union was served with				
24	Plaintiff's Waiver of Service and Complaint on September 7, 2021. The current deadline fo				
25	Trans Union to answer or otherwise respond to Plaintiff's Complaint is November 8, 2021.				
26	2. On November 8, 2021, counsel for Trans Union communicated with Plaintiff				
27	counsel via email regarding an extension within which to file a response to the Complaint, an				
28	Plaintiff's counsel agreed to the extension.				
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1	3.
2	parties believe
3	additional time
4	discussions.
5	4.
6	documents and
7	good faith and
8	5.
9	otherwise resp
10	motion for exte
11	Dotad this 9th
12	Dated this 8th
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	3.	The parties will actively discuss a potential early resolution of this case, and the
parties	believe	an extension of this nature may save waste of the parties' time and expense. The
additior	nal time	e will allow Plaintiff and Trans Union time to fully explore such early settlement
discussi	ions.	

- 4. Moreover, Trans Union's counsel will need additional time to review the documents and respond to the allegations in Plaintiff's Complaint. This Joint Motion is made in good faith and not for the purposes of delay.
- 5. Plaintiff has agreed to extend the deadline in which Trans Union has to answer or otherwise respond to Plaintiff's Complaint up to and including December 8, 2021. This is the first motion for extension of time for Trans Union to respond to Plaintiff's Complaint.

Dated this 8th day of November 2021.

QUILLING SELANDER LOWNDS WINSLETT & MOSER, P.C.

## /s/ Jennifer Bergh

Jennifer Bergh Nevada Bar No. 14480 2001 Bryan Street, Suite 1800 Dallas, Texas 75201 Telephone: (214) 560-5460 Facsimile: (214) 871-2111 jbergh@gslwm.com

COUNSEL FOR TRANS UNION LLC

LAW OFFICE OF KEVIN L. HERNANDEZ

## /s/ Kevin L. Hernandez

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8872 S. Eastern Avenue, Suite 270
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Telephone: (702) 563-4450
Facsimile: (702) 552-0408
COUNSEL FOR PLAINTIFF

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## **ORDER**

The Joint Motion for Extension of Time for Trans Union LLC to file an answer or otherwise respond to Plaintiff's Complaint is so ORDERED AND ADJUDGED.

DATED this 9th day of November, 2021.

HONORABLE DANIEL J. ALBREGTS UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE** 2 I hereby certify that on this the 8th of November 2021, I filed JOINT MOTION AND ORDER EXTENDING DEFENDANT TRANS UNION LLC'S TIME TO FILE AN 3 ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT with the Clerk of 4 5 the Court using the CM/ECF system, which will send notification of such filing to the following 6 counsel: 7 Kevin L. Hernandez Michael B. Lee kevin@kevinhernandezlaw.com mike@mblnv.com 8 Law Offices of Kevin L. Hernandez Michael N. Martin 8872 S. Eastern Avenue, Suite 270 9 matthis@mblnv.com Michael B. Lee, P.C. Las Vegas, NV 89123 10 (702) 563-4450 1820 E. Sahara Avenue, Suite 110 Las Vegas, NV 89104 (702) 552-0408 Fax 11 Counsel for Plaintiff (702) 731-0244 (702) 477-0096 Fax 12 Counsel for National Credit Systems, Inc. 13 Jeremy J. Thompson jthompson@clarkhill.com 14 Clark Hill PLLC 3800 Howard Hughes Parkway, Suite 500 15 Las Vegas, NV 89169 (702) 862-8300 16 (702) 862-8400 Fax 17 Counsel for Equifax Information Services, LLC 18 19 20 /s/ Jennifer Bergh JENNIFER BERGH 21 22 23 24 25 26 27 28